

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
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 Director

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FEB 15 2000

February 9, 2000

Ms. Wendy R. Dixon, EIS Project Manager
 Yucca Mountain Site Characterization Office
 Office of Civilian Radioactive Waste Management
 U. S. Department of Energy
 P. O. Box 30307, Mail Stop 010
 North Las Vegas, Nevada 89036-0307

Dear Ms. Dixon:

The Illinois Department of Nuclear Safety (IDNS) submits the following comments on the Draft Environmental Impact Statement for the Yucca Mountain Repository. IDNS has broad responsibility for safety relative to radioactive materials, including transportation of spent nuclear fuel in Illinois. Since 1983 when the Department's Spent Nuclear Fuel Inspection and Escort program was established, Department staff and other support agencies have inspected and escorted over 450 shipments of spent nuclear fuel and high-level waste without incident. We recognize that operation of a spent nuclear fuel repository at Yucca Mountain, Nevada, will obviously increase significantly the number of shipments traversing Illinois. Nonetheless, IDNS does have concerns about some of the assumptions made by the Department of Energy (DOE) in the transportation safety section of the draft EIS.

1...

The Department continues to respond to inquiries from reporters prompted by repository opponents fanning the public's fears of transportation disasters around the country. This is of course exacerbated by the state of Nevada's press releases pointing out that according to the DEIS nearly all spent fuel shipments from across the country will pass through Illinois in route to Yucca Mountain. If the proposed repository is established, the number of spent nuclear fuel shipments passing through Illinois undoubtedly will increase. However, the fiction fostered by the estimates of the frequency which these shipments will transit Illinois as presented in the DEIS needs to be corrected. While Illinois' extensive experience and expertise gained from its unique program for inspecting and escorting spent fuel shipments will make the transition to heavier shipment volume manageable,

Ms. Wendy R. Dixon, EIS Project Manager

Page 2

February 9, 2000

- 1 cont. no constructive purpose is served by distorting the expected shipment load at this time.
- 2 DOE indicates that the mode of transportation used to ship from each site depends on several factors outside of DOE control, such as capabilities of shipping sites, rail services, and labor agreements. As a result, DOE finds it impossible to predict the specific mode of transport in the DEIS. This is unacceptable and DOE needs to take control of these issues. Within the borders of Nevada, DOE seems capable and willing to take control of such issues by developing intermodal transfer stations, constructing new rail lines, and upgrading highways to accept overweight trucks. Outside Nevada however, DOE seems powerless to effect the safest alternatives. DOE needs to take responsibility for whatever infrastructure upgrades are deemed necessary for safe transportation, regardless of the district through which the spent nuclear fuel will pass.
- 3 Similarly, when describing the mostly rail option, DOE again states that since it does not control the routes, the EIS assumes that the railroads will choose the routes based on historic practices. This is not an acceptable method for choosing routes for transportation of spent nuclear fuel. Again, DOE needs to accept the responsibility for choosing the safest routes available and then specifying those routes to the contractors and carriers.
- 4... It is clear that even at this early date, DOE has made very specific assumptions about routes from each site to Yucca Mountain. How else could DOE calculate distances to four significant digits? Yet, DOE has chosen not to publish any specific routing maps in the draft EIS. DOE did, at IDNS' request, develop a map of Illinois to hand out at the February 1st public hearing in Chicago. This map was helpful, but we would urge DOE to include maps for all affected states in the EIS. This can hardly be a safeguards issue. The interstates and rail corridors will eventually become known, although the schedules will not.
- DOE has chosen to publish national maps that bear a striking resemblance to the route maps being circulated by the state of Nevada. We remind DOE that Nevada's objective is to oppose the repository project and DOE's objective is safe transportation. These two independent objectives don't lend themselves to a joint routing effort. DOE's decisionmaking process for choosing the safest available routes needs to be independent of Nevada's effort to convince the nation that safe transportation is an impossible task.

Ms. Wendy R. Dixon, EIS Project Manager

Page 3

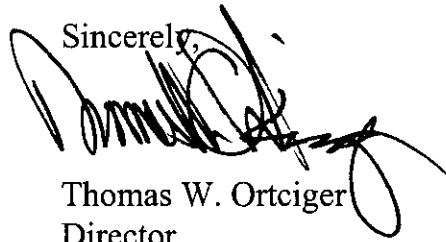
February 9, 2000

4 cont.

IDNS remains committed to working cooperatively with DOE on national and Illinois specific routing issues both directly and through the regional transportation workgroups. In particular, we will be discussing ways to avoid, whenever possible, highly congested traffic corridors such as I-80, 294, and 94 through the Chicago area, including avoidance of rush-hour traffic in such areas. If the mostly rail option is chosen, we will be discussing ways to route rail shipments from the East Coast to Yucca Mountain without moving a disproportionate number of shipments through highly populated areas near the Chicago switchyards. Most importantly, we will be emphasizing the need for DOE to consult with IDNS whenever specific Illinois routing and transportation-related issues arise.

If you have any questions regarding these issues, please contact me (217) 785-9868.

Sincerely,



Thomas W. Ortziger
Director

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